US EPA RECORDS CENTER REGION 5

Prepared for

City of St. Louis Park, Minnesota

# FIRST DRAFT REVISED GRADIENT CONTROL PLAN

Prepared by

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Project Number MN0949

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#### 1. INTRODUCTION

#### 1.1 Purpose

This plan describes the increased pumping and monitoring of the Prairie du Chien/Jordan (PdCJ) aquifer that will be conducted by the City of St. Louis Park (City) in addition to that currently being conducted under the Consent Decree-Remedial Action Plan (CD-RAP) and as documented in the most recent annual monitoring report. This plan is in response to the request from the Agencies dated February 4, 2014.

The PdCJ wells referenced in this plan are illustrated on Figure 1.

#### 1.2 Objectives

The content of the plan, including objectives, has been developed in close collaboration between the City and the Agencies in a series of meetings and conference calls during February, March and April 2014.

The Revised Gradient Control Plan is being implemented to prevent exceedance of the water quality standards applicable to the site at potential receptors. Increased pumping at selected well locations will increase hydraulic control of areas with polynuclear aromatic hydrocarbons (PAHs) at concentrations above standards and reduce the potential for increasing concentrations at potential receptors. The effectiveness of the pumping will be assessed through the monitoring and data evaluation described in this plan. A reevaluation mechanism is included in the plan to address contingencies presented by future monitoring results. Potential receptors include wells located hydraulically downgradient from areas with (PAHs) at concentrations above standards. Edina 13 (E13 on Figure 1), where the Advisory Limit for Other PAHs (OPAHs) was exceeded at certain times in previous monitoring, is an example of a potential receptor. Amendments to the water quality standards contained in the CD-RAP have been proposed by the City; adoption of amended standards will affect the gradient control plan, and will be accounted for in the reevaluation mechanism.

Recognizing that the remedy has been in place for three decades and that significant infrastructure supporting plan elements exists, wherever possible while addressing the objectives of this plan, implementation of the plan will express a preference for utilizing existing infrastructure, such as wells, pumps, pipes, treatment works, pressure transducers and the like. Current methods of measurement, data management and reporting being implemented for site monitoring are expected to address this objective.

The analytical methods used will need to be appropriate and accurately measure PAHs in groundwater. Amendments to the list of parameters contained in the CD-RAP have been proposed by the City; adoption of the amended parameter list will affect the gradient control plan, and will be accounted for in the reevaluation mechanism. The sampling and analysis procedures expressed in the current monitoring plan and Quality Assurance Project Plan (QAPP) for the site are appropriate means to address monitoring objectives.

The data evaluation methods will include i) trend analysis and ii) standards comparison and will need to be accurate and precise in order to support decision making described in this plan. The methods of trend



analysis currently in place for site monitoring and as reported in the annual monitoring report is expected to address this objective.

#### 1.3 Scope

The scope of the plan includes the following:

- 1. Pumping schedule for a well in the PdCJ aquifer –W23 and/or SLP10/15;
- 2. Monitoring schedule for selected wells in the PdCJ aquifer to include measurement of potentiometric head, pumping rate, and PAH concentration,
- 3. Reporting of collected data, and
- 4. Evaluation of collected data and a reevaluation mechanism to address contingencies presented by future pumping and monitoring results.

The plan includes description of the scope and schedule of the pumping, monitoring and reporting and methods of data collection, if these differ from those described in the site monitoring plan. The QAPP for the site is incorporated by reference.

#### 2. PUMPING SCHEDULE

Data are currently being collected by the Agencies and others that are relevant to the pumping schedule, including pumping test data, capacities, pumping projections for Edina, Meadowbrook Golf Course, Methodist Hospital and St. Louis Park and treatment capabilities. As appropriate, these factors will be evaluated and used to select a pumping well and to specify or modify the pumping schedule.

Pumping will be in accordance with the following schedule (increase above current rates):

Well	Unique No.	Pumping Rate (Monthly average		
SLP10/15	206442 / 215447	200		
W23	216050	25		

The location of the PdCJ aquifer wells is illustrated on Figure 1. Well construction information for the wells listed above is provided in Appendix A. Well information includes the following details: i) well ownership and access information ii) pump size and capacity, iii) treatment method and capacity, iv) discharge means, location and permitting.

Discharge volume and rate from pumping will be monitored and reported in the Annual Monitoring Report on a monthly average basis.

Operation and maintenance of the pumping well is the responsibility of the well owner and such activities will be reported in the annual report.

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Permit requirements will be met for appropriations and discharge based on the specifics detailed in the pumping schedule. A schedule for permitting and startup of the pumping schedule will be provided when the pumping schedule is finalized.

#### 3. MONITORING SCHEDULE

Monitoring for this plan will include collection and reporting of the following data:

- 1. Discharge rate and volume from the pumping well(s) included in this plan;
- 2. Potentiometric data from selected wells;
- 3. PAH concentrations in groundwater samples from selected wells.

Monitoring locations included in this plan are as follows:

- 1. SLP5 (Unique No. 203196);
- 2. 8098 Excelsior Boulevard Well (Unique No. 273822); and
- 3. Blake School Well (Unique No. to be determined by MDH).

The location of the wells is illustrated on Figure 1. Well information for the wells listed above is provided in Appendix A.

#### 3.1 Discharge Rate and Volume from Pumping Well

The discharge rate for the pumping well(s) listed above will be monitored continuously using standard flow metering equipment and methods. The data will be reported as a monthly average in gallons per minute (gpm).

#### 3.2 Water Level Data

Water levels will be monitored on the schedule in Table 1.

Water level measurements will be made using methods described in the site monitoring plan. Water levels will be adjusted to elevations based on survey data for the applicable point of measurement. Water level data from the pumping well(s) will be reported as measured and adjusted for well efficiency.

The data will be tabulated and reported to the Agencies.

#### 3.3 Sampling and Analysis for PAHs

The PAH concentration will be measured by sampling and analysis according to the schedule in Table 1.

Depth of sampling at SLP5 will be based on an evaluation of the presence of cavernous porosity. In the absence of presence of cavernous porosity, the sample will be collected from the approximate mid-point of the open-hole portion of the well, based on the well log (Appendix A). A target sampling depth will be



selected in consultation with the Agencies based on video log observations, and the pump intake for sampling will be set at this depth. The depth of sampling for the Blake School well and the 8098 Excelsior Boulevard well is constrained by the setting of the pump in each well. The pump setting information will be obtained from the well owner.

Sampling will use a bladder pump at SLP5 and pumps for irrigation at the 8098 Excelsior Boulevard well and the Blake School well.

Analytical methods, reporting limits and quality assurance will be in accordance with the QAPP for the site.

Data will be compiled into the chemical database and tabulated for reporting in the manner currently used for monitoring data at the site.

The health and safety plan currently in place for the site will govern monitoring activities conducted under this plan.

#### 4. DATA EVALUATION

#### 4.1 Pumping Data

The monthly average pumping rate data will be used to evaluate i) temporal fluctuations and ii) trends that affect groundwater flow direction and PAH concentrations in the area influenced by the pumping well. The data will be evaluated on an annual basis and the results of the evaluation will be reported to the Agencies.

#### 4.2 Water Level Data

The water level data will be used to evaluate i) temporal fluctuation and ii) trends that may affect groundwater flow direction. The data will be compiled together with site-wide water level data, collected synoptically (to the extent practicable) and reported as part of the annual monitoring report in accordance with the existing monitoring plan for the site.

#### 4.3 PAH Concentration Data

The PAH concentration data will be used i) for standards comparison, ii) to evaluate temporal and spatial trends and iii) to guide decisions regarding continued implementation of this plan.

Trend analysis will be conducted using data from the well listed in this plan, using the methods currently being employed at the site. Trend analysis time periods for other wells in the area, such as Edina 13, will be evaluated using a starting date of the increased pumping implemented as part of the plan. A minimum of four rounds of data will be needed to evaluate the trends.



#### 5. REEVALUATION MECHANISM

The continued implementation of this plan is subject to data that is yet to be collected and evaluated. As such, the following mechanism is planned to allow reevaluation of conditions on a forward-going basis.

The data for a given calendar year will be compiled in the annual report. Data collected and evaluated as part of this plan will be discussed in a specific section of the annual report devoted to the reevaluation of the need for i) continued implementation of this plan or ii) modification to this plan.

The increased pumping conducted for this plan uses finite resources including the limited groundwater resource of the PdCJ aquifer, energy, and economic resources and as such will be ceased if collected data demonstrates that it is appropriate to do so, based on the following criteria.

Criteria	Measure				
Comparison with PAH standards specified in the CD-RAP at the time of evaluation	No exceedances at potential receptors during most recent 2-year monitoring period beginning 2014				
PAH concentration trend	Stable or decreasing trend at monitoring locations listed in this plan, beginning analysis with 2014 or, if increasing trend, rate of increase will not result in exceedance within 100 years.				

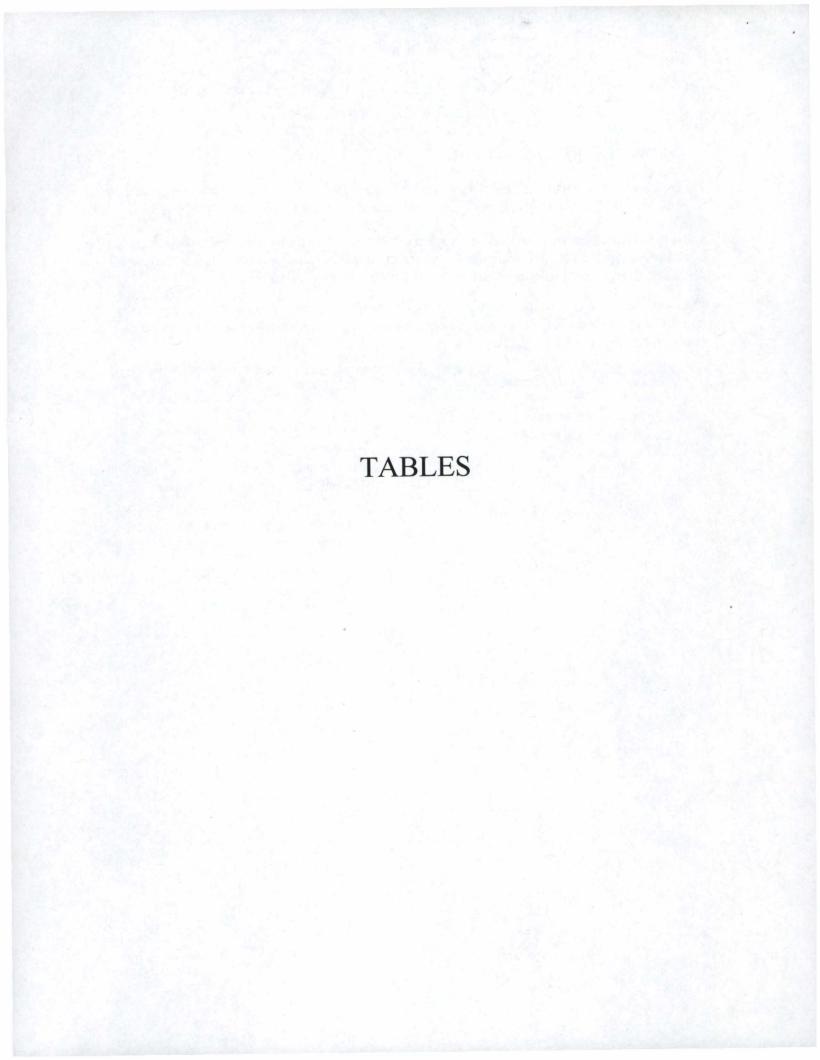


Table 1

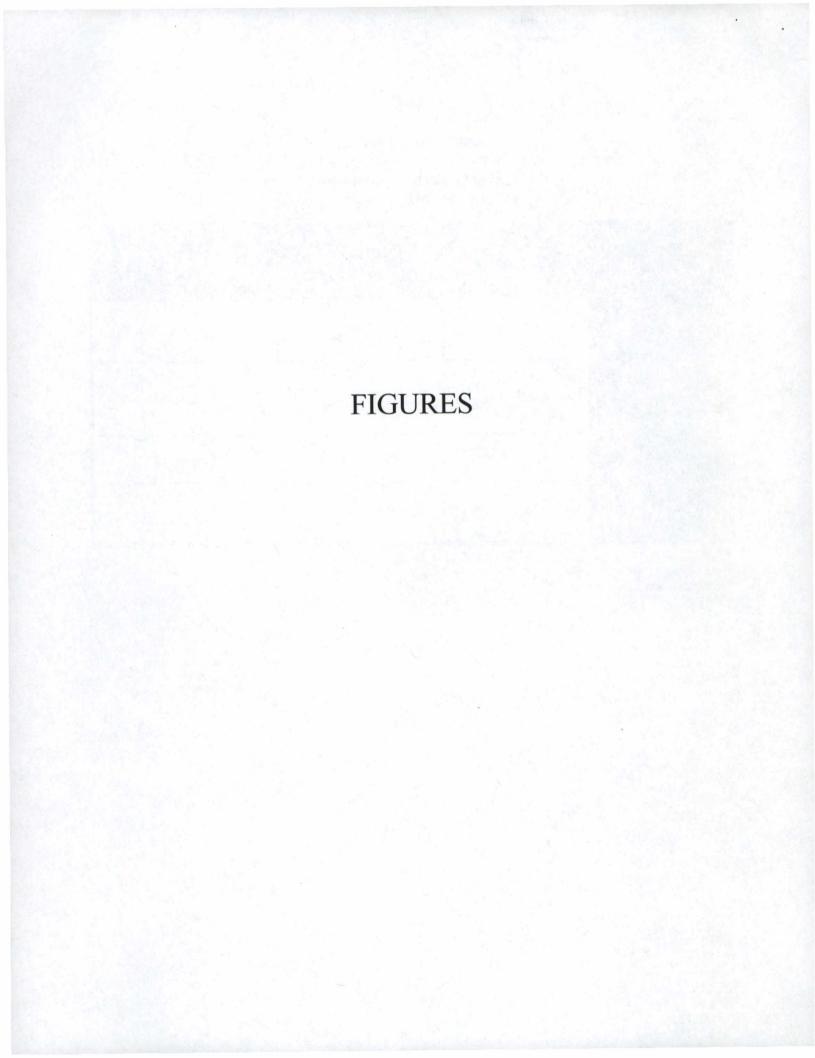
## Monitoring Schedule Draft Revised Gradient Control Plan City of St. Louis Park, Minnesota

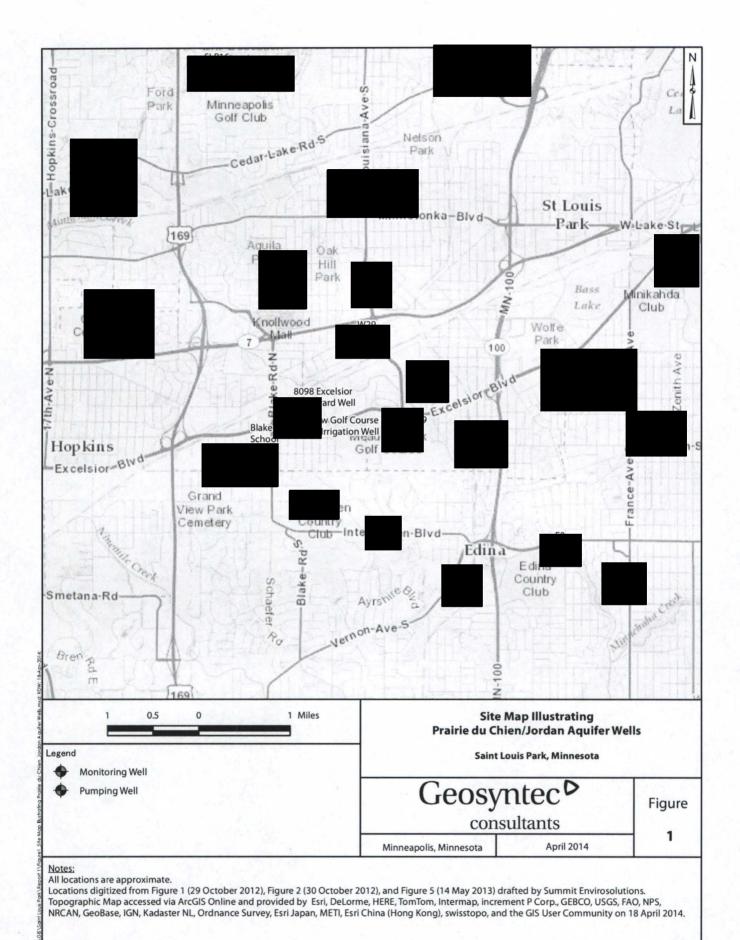
	SLP5	8098 Excelsior Boulevard Well	Blake School Well
Unique No.	203196	273822	To be determined by MDH
Water Level Measurement Frequency	At sampling	At sampling	At sampling
Sampling Frequency	Semiannual	Semiannual	Semiannual
Parameter	РАН	РАН	РАН

Notes:

PAH = Polynuclear aromatic hydrocarbon

MDH = Minnesota Department of Health





## APPENDIX A

Supplemental Well Information

#### Appendix A

#### Supplemental Well Information Reilly Site Draft Revised Gradient Control Plan, St. Louis Park, Minnesota

Kithi dali			Pu	mping Wells			
	Well Owner	Unique Number	Well Access	Pump	Pump/Treatment Capacity	Treatment Method	Discharge Permit
SLP10	City of St. Louis Park	206442	accessible	submersible	1400	GAC	not applicable
SLP15	City of St. Louis Park	215447	accessible	submersible	1400 gpm¹	GAC	not applicable
W23	City of St. Louis Park	216050	accessible	submersible	150 gpm	GAC	NPDES/SDS

	Monitoring Wells							
	Well Owner	Unique Number	Well Access	Dedicated Pump	Well Diameter	Well Depth		
SLP5	City of St. Louis Park	203196	accessible	None	16	465		
8098 Excelsior Boulevard Well*	Alex Ugorets	273822	coordinate with site owner	None	8	387		
Blake School Well**	Blake School	To be determined by MDH	coordinate with site owner	Submersible	6	376		

#### Notes:

Diameter dimension in inches

Depth dimension in feet

- 1 Combined capacity for SLP10/15.
- \* Dimensions for 8098 Excelsior Boulevard Well are from MDH, based on logging on April 8, 2014.
- \*\* Dimensions for Blake School Well are estimates provided by Ken Nivala at Blake School.

GAC = granular activated carbon

NPDES/SDS = National Pollution Discharge Elimination System/State Disposal System gpm = gallons per minute

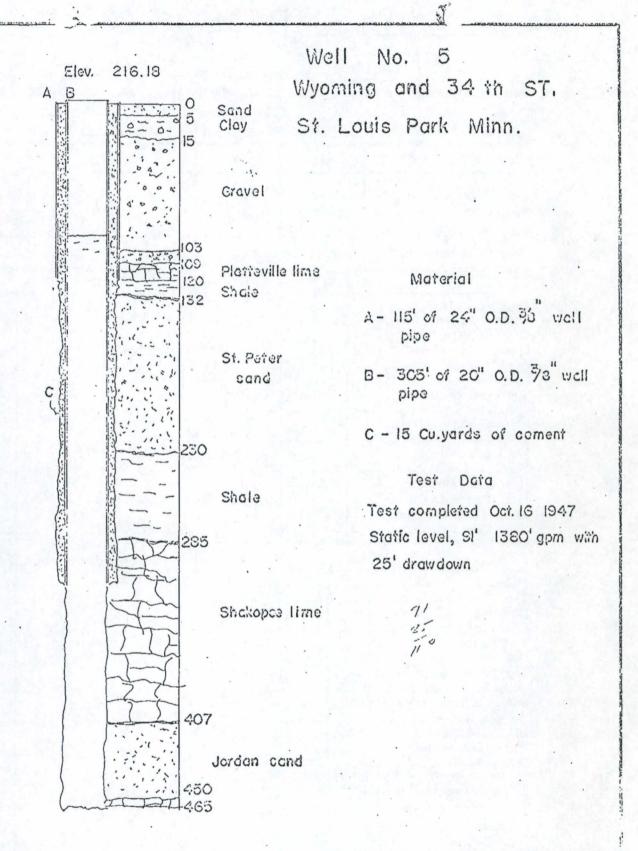
## LAYNE-WESTERN COMPANY OF MINNESOTA

### FIELD REPORT OF COMPLETED WELL

Name of Job St. Louis Park, Minn. Date started 5/28/47

Addre	ss		ell no. 妻 5 exas Avenue					Date completed <u>8/21/4'</u> No. of days <u>61</u>
				OG	OF			
From	To		Material		F	rom	То	Material
0	5	sand a	& gravel			132	230	St. Peter sand
5	15	clay a	& boulders			230	285	shale & rock
15	103	sand 8	k gravel			285	407	Shakopee lime
103	109	coars	e gravel			407	460	Jordan sand
109	<b>k</b> 20	platte	eville lime			460	465	St. Lawrence
120	132	rock &	& shale					
			und level to					tatic water level_871
Беріп	01 11							WELL
	0	pening	Length - f	eet	Dia	meter	- inch	es Material
Scree	n	none		7.5%				
Inner	casin	g	3051			2011 0	.D.	3/8" wall Welded
Outer	casin	ıg	115			24" 0	.D.	3/8" spiral welded
Was o	uter	casing (	cemented		yes			Amount 15 vds cement
Size	of gre	avel use	edir	1. to _		_in., /	Amour	11
			TE	ST	OF	= W	EL	L
Hours	Pun	nped	Yield	Wo	iter L	evel	-	Domanka
From	T	0	gal. per min.	ft. b	elow s	urface		Remarks
Did we	II cle	ar up _				Time	to cl	ear
Date_	8/21	/47		Dril	ler	Pa	ul Sh	uey

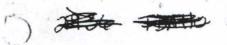
Tack No									
Well No5									
				*****	Town	St. Loui	ls Perk		
Date Started 5/28/47	7							nesot	G
Date Completed 8/21/47									
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Location.0001 W.04011		Teve	19. A	v.c.•	lotal	Depth of Well	***************************************		
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Bottom of Pipe below Surface	Cel	115		30	51				1 10
				1			1		
No. of Ft. of Pipe in the Ho	1			1.					
No. of Ft. of Hole Drilled				ļ				***********	
TEST	1	2	3	4		FORMATI	ON	Thickness	Depth
	165				Sand	& Gravel		5 .	5
Depth of the Hole Depth to Water at Rest	87					& Boulders	3	10	15
Depth to Water Pumping						& Gravel		88	103
Depth of Pump Pipe						e Gravel		6	109
Size of Cylinder								11	120
Length of Stroke					and the second second	& Shale		12	132
Strokes per minute								98	230
Gallons per minute						& Rock		55	285
Will well supply more?						pee Lime		122	407
Was Strainer in Hole?						n Sand		53	460
Was water clear?					St. I	awrence		5	465
Was well pumping sand?									
Hours putting in Pump					7 - 37				
Hours Pumping Hours taking out Pump					TO TO	ls. cement	usea.		. 10
Hours Consumed					10/75	5/51-Above	from Vral	steat	Rec
Tiours consumed		1				/51-Statio	761 et 1	300 G	שנים ב
STRAIL	NER				12/01		drew down		
Make			T					17	
Type of Metal	•••••			*********					
Diameter O. D.									
Diameter I. D					-	* - 1			
Total Length								1	
Number									
Top of Screen below Surface									
No. of Ft. Exposed									
Bottom of Screen below Sur	face								110
Was Str. swedged									100
Did Sand come thru Str Was Str. coarse enough									
									1



Well built by Layna Minnacota Co Minnacottis Minn.

468	SERVATION DEPARTMENT (104-B) Hop Kins qua
Will-97, GUELL #4 Locales Louis  (Remore 269) & Well #4 Locales Minnesota Cons  (Remore 269) & Tolor Cons  (Remore 269) & Well LO	ERVATION DEPARTMENT
18 5 A 38 SU ALL WELL TO	G STATEMENT 20319610 No
R 4 CLASSED WELL LO	TR OPPICE BLDG. ST. PAUL 1. MINN. Well No. 117/21 - 18 child
AIL REPORT PROMPTLY TO DIRECTOR, DIVISION OF WATERS, STA	TE OFFICE BLDG., ST. PAUL 1, MINN.   WELL NO.
Location of Well 57, Louis	Well # 5 Locate Well on Plat of Section
11	
County City or Town	vi- fork Sec. 18
Wyomine & 34th	5/- Twp. 1/71
Describe Further by Lot, Block Nearest Highway, St	Range 21W
Drilled for: 117-21-18 dalbabe	Driller Layne - Minn -
Address eles, 930	Address
Date of Completion 1947	REPORT OF FINAL PUMPING TEST
Date of Completion	pace of rest
SiteUpland, Valley, Hillside, Etc.	Duration of TestMin.
Type of Well Drilled	Rate of Pumping 1,380 CPM
Dug, Driven, Bored, Drilled	Static Water Level 9/ Ft. 7 839
Drill Rig UsedSolid Tool, Jet, Rotary	
Diameter: TopBottom	Water Level While Pumping 16 Ft.
Depth of Well 7650	Drawdown 25 Ft.
1 9 36 7	Time Required for Recovery
Ground Elevation Sea Level Datum or Give Distance Above	Expected Average Yield Gal. per day
or Below R. R., Highway, Lake, Etc.	If Other Tests were Mide, Give Details on Another
	Sheet.
	Were Measurements Made of Effect on Other Nearby Wells During Test? / Give Details.
Quality of Water (Hard or Soft, Fresh or Salty, Etc.)	ments burning descripture becaris.
Temperature of Water	
Was Laboratory Analysis Made?	
For What Purpose Will Water Be Used?	
For much Purpose will make be oscu.	
Is Well Pumped? 45 Pump Capacity 200 GP	M
Was Well Sealed on Completion?	
에다 시 점하는 것들은 보이면도 거짓되었습니다. [10] [10] [10] [10] [10] [10] [10]	
Natural FlowGPM	
What Pressure, or Head, at Ground Level?	
Principal Aquifer Penetrated	

Geologic Formations d, Color, Hard or Soft	Thickness of	Depth	in Feet	Casing Diam.	Water Conditions Found
/ 1/	Formation	From	To	24N	
erift 45.	109	0	109	24" ·	to 305' 5 came t spe
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5t. Peter 5.5.		132	230		16" open hole
(Shale	153	230	285		
She Kope entis.	122	285	407		
Jordan 55		407	450		
L.s:	58	450	465		
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	460				707
					82
					1/5
		. 9419	•		
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					-523
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		-			
				Gravel P	Size, Type, & Location of Any Screens, acks, Grouting, or Other Development
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struction of this well.					
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		(11			
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REPORT

\*) 215447 W.L. E

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Location					Total I	Depth of Well.	***************************************	**********	
DIAMETER OF HOLE	3	30	,,		24"				
Top of Pipe above Surface. Bottom of Pipe below Surface. No. of Ft. of Pipe in the H. No. of Ft. of Hole Drilled	ole	103	• • • • • • • • • • • • • • • • • • • •	3				************	
			T	1	T				
TEST	1	2	3	4		FORMAT		Thickness	Depth
Depth of the Hole Depth to Water at Rest Depth to Water Pumping			********		Blas	ial slift	er : fix		102
Depth of Pump Pipe  Gallons per minute  Will well supply more?					24.02	ter sandin	rsk	164	288
Was Strainer in Hole? Was water clear?					Shake	gee Grea	ta lominock	114	40
Was well pumping sand? Hours Pumping					Jorda	in seiner	rek	30	
STRA	INEF	2			St 1	switte .	tiple	21	503
Make		\		/		shot at		1	
Bottom of Screen below Su Was Str. swedged Did Sand come thru Str Was Str. coarse enough Style of Fittings	rface			<u> </u>	1		126m	1 1	H
All measurements taken from						1 116 5	HAT.		



	located @ West 29th St : I.	
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	dr.ft 0-102	
	Platterille linestone 102-12	4 OPVL LMSN
	St. Peter Sandstone 124 - 28	18 OSTP SNDS
namanany - 11112 nan sy kao anaona na kao ari	To a first the second s	12 OPPC DEMT
Anna da la casa da la c	the second secon	32 CODN SUDS
	St. Lawrence Shale 482-5	03 CSTL STA
	30" O to 102 grouted	
	30" O to 102 grouted 24" O to 402 grouted	
and the later of		Aquifer CJDN
n ga gallata in the state of th		
Managara (a		SHOULE NUMBER VERIPROSINGS